

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Western Massachusetts Electric Company )  
Transition Charge Reconciliation January through December 2002)

DTE 03-34

**PETITION OF WESTERN MASSACHUSETTS INDUSTRIAL CUSTOMERS GROUP  
FOR LEAVE TO INTERVENE AS A FULL PARTICIPANT**

Now come General Electric Company, MeadWestvaco Corporation, and Solutia, Inc. (collectively the Western Massachusetts Industrial Customers Group "WMICIG") and hereby petition for leave to intervene in the proceeding docketed as DTE 03-34 concerning the amended reconciliation filing of Western Massachusetts Electric Company ("WMECo") filed on September 26, 2003 with the Department of Telecommunications and Energy ("Department"). WMICIG states as follows:

(1) The customers purchase large amounts of electricity and distribution service under various tariff rates of Western Massachusetts Electric Company including rates T-2 and PR and special contracts on file with the Department.

(2) The customers have been permitted to intervene and have actively participated in numerous rate filings of WMECo including without limitation the Electric Restructuring Filing in DTE 97-120. The customers have an ongoing interest in continuing its participation in the present proceeding which will reconcile the transition charge filing by WMECo and determine the proper way to reflect an over-collection through the end of 2002 of over \$28 million as alleged by WMECo. The Company has asked the Department to accelerate the amortization of transition costs by the amount of the over-recovery. The Customers seek to review alternatives

including a current reduction in the transition charge in view of a proposed increase in the standard offer cost of over 6 mills filed with the Department on October 24, 2003 to become effective on January 1, 2004.

(3) The interests of the Industrial Customers are not adequately represented by the Attorney General, who represents primarily the interests of residential customers.

(4) The participation of WMICIG in this proceeding will including a full review of the alleged amount of the over-recovery, cross-examination of witnesses, filing comments and briefs.

(5) WMICIG also requests that the Department make an initial determination prior to approval of rates and charges for 2004 that all or a portion of the over-recovery be used to offset any increase in rates for 2004 including the increase in the standard offer generation charge.

WHEREFORE, WMICIG prays that the customers be permitted to intervene as a full intervenor.

Respectfully submitted,

GENERAL ELECTRIC COMPANY,  
MEADWESTVACO CORPORATION,  
SOLUTIA, INC.  
by their attorneys,

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Date: October 27, 2003

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all parties of record in these proceedings in accordance with the requirements of 220 CMR 1.05(1) (Department's Rules of Procedure and Practice).

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Andrew J. Newman

Date: October 27, 2003